

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Rinne Corp,

Plaintiff,

v.

The Partnerships, and Unincorporated
Associations Identified in Schedule A,

Defendants.

Case No. 1:23-cv-16232

Honorable Judge Jeffrey I. Cummings

DECLARATION OF MIAO XU

I, Miao Xu, declare as follows:

1. I am an employee of Vanice Technology (**Vanice**), which operates the internet store, enjoyaitlife.com (the **Store**), identified in this lawsuit. In this capacity, I have personal knowledge of the Store's operation and sales and have access to Vanice's business records.
2. I make this declaration based on my personal knowledge and after reviewing Vanice's business records. If called as a witness, I can competently testify to the matters stated herein.
3. Vanice is incorporated and has its principal place of business in China. Vanice operates the Store exclusively in China. Vanice has never owned or utilized an office, hired employees, agents, or representatives, maintained bank accounts, owned assets or properties, or qualified to do business in Illinois or any other part of the United States.
4. Neither the Store nor Vanice has targeted Illinois residents with their advertisements, nor directed any marketing efforts or materials at Illinois.

5. Rinne Corp (the **Plaintiff**) alleges the Store has infringed on its copyrights and trademarks. Specifically, Plaintiff's counsel has provided the attached **Exhibit A**, which shows the allegedly infringing products (collectively, **Alleged Products**).

6. After reviewing the complaint and Exhibit A provided by counsel, I conducted a diligent search of the Store's sales records for the Alleged Products. **Exhibit B** contains complete and accurate sales records, maintained in the ordinary course of Vanice's business.

7. Exhibit B shows that the Store has made no sale of the Alleged Products in the U.S.

8. The Store has not received summons of this lawsuit at its email address.

9. There are many similar mousetrap products for sale online. A brief search reveals numerous similar pictures and sales links for such products. Many listings use product descriptions of "flip and slide." *See* Exhibit C.

10. Before this litigation, the Store was not aware, nor had any reason to be aware, that it could be infringing any copyrights or trademarks. The Store has not attempted to market or pass off its products as those of the Plaintiff or any other party.

11. The Store uses the Paypal account, vanice211@outlook.com, for the Alleged Products, which has a frozen amount of \$111,876.3 due to the asset restraints imposed by this litigation.

12. The Store still plans to continue business operations. However, the existing restraints significantly hinder the Store's liquidity and ability to maintain normal operations.

13. Upon notice of the current litigation (not through service of summons), Vanice has permanently removed the listings of the Alleged Products. While Vanice is moving to challenge the Preliminary Injunction Order (Dkt. 41), Vanice assures the court it will not relist the Alleged Products for sale until further ordered by the court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

[The remainder of this page is intentionally left blank.]

Executed on this 27th day of May, 2024, in Chengdu, Sichuan, China.

Dated: May 27, 2024

By: Miao Xu
Miao Xu

EXHIBIT A



What's Included



🎅🌲 Christmas Hot Sales -50% OFF - Smart Flip N Slide Bucket Lid Mouse Trap

~~\$34.99~~ \$68.98 **Save 49%**

📦 4.2K Month Sold

👍 It's been recommended by 4.7K people on Facebook, Twitter and Instagram

👁️ 673 people are viewing this right now

🔥 Buy 2 Get Free Shipping 🔥

Yellow

💰 Buy More Save More 💰

Buy 1

Buy 2 🔥 50% OFF & Free Shipping

Buy 3 🔥 70% OFF & Free Shipping

Buy 4 🔥 75% OFF & Free Shipping

🚚 Shipping 🚚

Fast US Shipping (5-7days)

Quantity

— 1 +

Small: only 3% left

Tight Inventory

🛒 ADD TO CART

BUY IT NOW

What's Included



Slide Bucket lid Mouse Rat Trap



Slide Bucket lid Mouse Rat Trap



How This Trap Works



Slide Bucket lid Mouse Rat Trap



🎅❄️ Christmas Hot Sales -50% OFF - Smart Flip N Slide Bucket Lid Mouse Trap

\$34.99 ~~\$68.98~~ **Save 49%**

- 📦 4.2K Month Sold
- 👍 It's been recommended by 4.7K people on Facebook, Twitter and Instagram
- 👁️ 673 people are viewing this right now

🔥 Buy 2 Get Free Shipping 🔥:

Yellow

💰 Buy More Save More 💰:

- Buy 1**
- Buy 2 🔥 50% OFF & Free Shipping
- Buy 3 🔥 70% OFF & Free Shipping
- Buy 4 🔥 75% OFF & Free Shipping

🚚 Shipping 🚚:

Fast US Shipping (5-7days)

Quantity

-

1

+



Small: only 3% left

Tight Inventory

🛒 ADD TO CART

BUY IT NOW

What's Included



Slide Bucket Lid Mouse Trap



Slide Bucket Lid Mouse Trap




How This Trap Works




How This Trap Works

1.




Mice climb the provided ramp toward the bait located inside of the tunnel

2.




Mice will inch out onto the counter weighted platform to eat the bait

3.



The mouse's weight will trigger the platform to fall forward

4.



The platform will then automatically reset for the next mouse

🎅🌲 Christmas Hot Sales -50% OFF - Smart Flip N Slide Bucket Lid Mouse Trap

\$34.99 ~~\$68.98~~ **Save 49%**

📦 4.2K Month Sold
👍 It's been recommended by 4.7K people on Facebook, Twitter and Instagram
👁 673 people are viewing this right now

🔥 Buy 2 Get Free Shipping 🔥

Yellow

💰 Buy More Save More 💰

Buy 1

Buy 2 🔥 50% OFF & Free Shipping

Buy 3 🔥 70% OFF & Free Shipping

Buy 4 🔥 75% OFF & Free Shipping

🚚 Shipping 🚚:

Fast US Shipping (5-7days)

Quantity

-

1

+



Small: only 3% left

Tight Inventory

ADD TO CART

BUY IT NOW



What's Included



WHY OUR MOUSE TRAP BUCKET LID OVER CONVENTIONAL TRAPS?

- 🐭🐁 Automatically Resets and holds upwards of 30 mice and 10+ medium-sized Rats; unlike conventional traps which only catch 1 or 2
- 🧼👤 Sanitary And No Mess - No more having to dispose of dirty corpses from a glue or snap trap, which can potentially infect you with a deadly disease. Now simply release/dispose of the mice/rats without getting close to the mess.
- 🔧🔄 Reusable - The Smart Flip n Slide Bucket Lid Mouse Trap is not a one-and-done throwaway product. You can use our trap repeatedly without having to toss it out.
- 🐾👶 Pet/ Children Friendly - Stop purchasing traditional Mouse/Rat traps which can harm your family pet or even worse... your children. Our Mouse/Rat trap is 100% safe and nontoxic.

HOW IT WORKS?

Turn an ordinary 5-gallon bucket into the best trap on the market. No more dealing with 1-time use traps that are often ineffective and unsanitary. With our new Smart Flip n Slide Bucket Lid Mouse Trap, all you have to do is snap it onto a standard-sized 5-gallon bucket and boom you're catching mice and rats.



🎅 Christmas Hot Sales -50%...
\$34.99 \$68.98

🔥 Buy 2 Get Free Shipping 🔥

💰 Buy More Save More 💰

📦 Shipping 📦

Quantity

Yellow

Buy 1

Fast US Shipping (5-7day...)

1

🛒 ADD TO CART

1664 sold in last 24 hours

Cart

>

Information

>

Shipping

>

Payment

Contact

john doe789@gmail.com

Change

Ship to

73 E Lake St. Chicago, 60601 Illinois United States (US)

Change

Shipping method

●

Fast Shipping

\$ 5.99

< Return to information

Continue to payment

[Refund policy](#)

[Privacy policy](#)


[Terms of service](#)

[Shipping policy](#)

[Contact us](#)

[About us](#)

All rights reserved enjoyaitlife



🎅🌲 Christmas Hot Sales -50% OFF -

Smart Flip N Slide Bucket Lid Mouse Trap

\$ 34.99

Yellow / Buy 1 / Fast US Shipping (5-7 days)

Coupon code

Apply

Subtotal

\$ 34.99


Shipping

\$ 5.99

Total


USD \$ 40.98

WHY CHOOSE US?




30-day Satisfaction guarantee with Money Back

If you are not satisfied with your products, you can contact our customer service and return it.




Over 34.245 successfully shipped orders


We made as much happy customers as many orders we shipped. You simply have to join our big family.




COMPRA REALIZADA




PAGAMENTO APROVADO



PREPARANDO PARA ENVIO



PEDIDO DESPACHADO



PERÍODO ENTREGA DE 5-7 DIAS

EXHIBIT B

All Orders

Export

Import

All

Unfulfilled

All order status ▾

All delivery... 

Start date ~ End date

All paymen... ▾

All payment c... ▾Country/ R... ▾

Payment Status

smart-flip-n-slide-bucket-lid-mouse-trap

Search

	Order number	Payment time	Payment Status	Payment method	Payment channel	Logistics status	Total Amount	Product	Country/ Region	Operation
---	--------------	--	----------------	----------------	-----------------	------------------	--------------	---------	-----------------	-----------

0 total

50 / page ✓

EXHIBIT C



Kat Sense: Your Department of Defense



★★★★☆ 6,882

\$17⁹⁶ ~~\$19.96~~ ✓prime

Save 10% more
with Subscribe & Save



Customers who viewed this item also viewed



Pack 2 Bucket Lid Mouse Trap, 5 Gallon Bucket Compatible, Mouse Catching Tool, Trap Door Style, Multi Catch, Auto Reset, Indoor Outdoor (Wine)

★★★★☆ 49

\$14⁹⁹



Pack 3 Bucket Lid Mouse Rat Trap, Mouse Catching Tool, Trap Door Style, Multi Catch, Auto Reset, Indoor Outdoor, 5 Gallon Bucket Compatible

★★★★☆ 7

\$23⁹⁹ (\$8.00/Count)



Arber Traps Bucket Lid Mouse Trap, Fits on 5 Gallon + 12 Pcs Sticky Mouse Traps Glue + 6 Pcs Spring Snap Traps for Mice - Multi Catch Human...

★★★★☆ 38

\$29⁹⁷

Patio, Lawn & Garden › Pest Control › Traps



Roll over image to zoom in



2 Pack Mice Mouse Trap Bucket Flip Lid, Bucket Lid Mouse Rat Trap Indoor Outdoor, Humane Mouse Trap, Mouse Catching Tool Auto Reset, 5 Gallon Bucket Compatible (Without Barrel)

Brand: K UWSEIY

3.1 ★★★★★ 24 ratings

100+ bought in past month

\$12⁹⁹ (\$6.50 / Count)

Get Fast, Free Shipping with Amazon Prime

FREE Returns

Get \$10 off instantly: Pay \$2.99 ~~\$12.99~~ upon approval for the Amazon Store Card. No annual fee.

Brand	K UWSEIY
Color	2 Pack
Style	Modern
Material	Plastic
Product Dimensions	12.17"L x 12.17"W x 2.99"H
Number of Pieces	1

See more

About this item

- 【Bucket Mouse Trap】Automatically resets and holds upwards of 10 mice and 5+ medium-sized Rats. Unlike conventional mouse trap bucket lid which only catches 1 or 2. The test concluded that the multi-catch traps by almost 4x. [5 Gallon Bucket is NOT included]
- 【Pet/Children Friendly】Stop purchasing traditional mouse trap which can harm your family pet or even worse harm your children. Our humane mouse trap is 100% safe, please feel free to use it.
- 【Easy To Use】Only snap it onto a standard-sized 5 gallon bucket mouse trap and boom your catching mice and rats. Now simple release of the mice far away from your house.



Enjoy fast, free delivery, exclusive deals, and award-winning movies & TV shows with Prime

Try Prime and start saving today with fast, free delivery

Delivery

Pickup

One-time purchase:

\$12⁹⁹ (\$6.50 / Count)

Get Fast, Free Shipping with Amazon Prime
FREE Returns

FREE delivery **Tuesday, May 28** on orders shipped by Amazon over \$35

Or fastest delivery **Friday, May 24**. Order within **9 hrs 22 mins**

Delivering to Los Angeles 90020 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by K UWSEIY
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Payment Secure transaction

Add a gift receipt for easy

Patio, Lawn & Garden › Pest Control › Traps



Roll over image to zoom in



Mouse Trap, Flip and Slide Bucket Lid Mice Rat Trap, for Indoor Outdoor Multi Catch Auto Reset (Size : Black)

Brand: SnOwky

\$36⁸⁹

Get \$10 off instantly: Pay \$26.89 ~~\$36.89~~ upon approval for the Amazon Store Card. No annual fee.

Size: **Black**

- Yellow
\$36.89
- Red
\$36.89
- White
\$36.89
- Black**
\$36.89

Brand SnOwky
Color One Color
Item Weight 516 Grams
Number of Pieces 1

About this item

- 【Special Designed】This trap was designed with the intent to be used in a catch and release style, but it is optionable to fill the bucket up with water to make the trap lethal.
- 【Cleaner than ever】No more need to discard dirty mice with glue or traps, which can infect them with a deadly disease.Now, just release/dispose of the mouse without having to go anywhere near the mess.
- 【Easy to use】All you have to do is clip it into a standard size 5-gallon bucket and use it to catch rats and mice.No longer handle single-use traps, which are often ineffective and unhygienic.
- 【Family Friendly】Stop purchasing traditional mouse traps which can harm your family pet or even worse... your children. Our mouse trap is 100% safe .
- 【Reasonable use】We can spread peanut butter in the tunnel of the mousetrap, and the mouse will follow the smell into the tunnel, and fall back into the bucket without getting the peanut butter.

Report an issue with this product or seller



Kat Sense: Your Department of Defense
Kat Sense Covered Rat &...
\$17⁹⁶ ~~\$19.96~~ ✓prime
Save 10% more with Subscribe & Save

\$36⁸⁹

\$3.99 delivery **June 6 - 17.**

[Details](#)

📍 Delivering to Los Angeles 90020 -
[Update location](#)

In stock

Usually ships within 4 to 5 days.

Quantity: 1 ▾

Add to Cart

Buy Now

Ships from 新绛县盛田百货店
Sold by 新绛县盛田百货店
Returns 30-day
refund/replacement
Payment [Secure transaction](#)

Add to List



HECO ARMOR
Outdoor
Hanging Wasps
Traps

HECO ARMOR Wasp Traps, Outdoo...
★★★★☆ 69
20% off **Limited time deal**
\$23⁹⁹ ~~\$29.99~~ ✓prime

Sponsored ⓘ



Los Angeles, 90020 • Burbank Super...



 [Sign In](#)
Account



Grocery & Essentials

Father's Day

Graduation

Summer Gathering

[Home](#)

Fashion

Patio & Garden

Health & Wellness

Registry

ONE Debit

Walmart+



Sponsored ⓘ



Flip N Slide Bucket Lid Mouse Trap, Slide N Bucket Lid Mouse Rat Trap, Auto Reset Mouse Trap for Indoor and Outdoor (Yellow)

 Free 30-day returns

\$999 Price when purchased online ⓘ

Add to cart

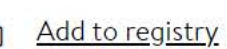
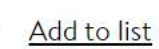
How do you want your item?



Pickup
Not available



Delivery to Los Angeles, 90020

[View seller information](#) **Free 30-day returns** [Details](#)

Best selling items that customers love



Sponsored

\$21.99

2 Pack Mouse Catchers Bucket Lid with Upgraded Clear Box, 2 Entrances & Auto Reset, Reusable Humane Rat Catcher for...

2-day shipping

+ Add

Got ants? Defend your home with Combat.

Sponsored



Package does NOT include Bucket
(Trap Lid fits 5 Gallon Bucket)



MG

Mouse Rat Trap Flip & Slide Mouse Trap Bucket Catcher Mousetrap Slide Bucket Lid

★★★★☆ (3.2) 29 reviews

Free shipping

Free 30-day returns

\$9.95 Price when purchased online

Add to cart

How do you want your item?



Shipping
Arrives May 31
Free



Pickup
Not available



Delivery
Not available

Delivery to Los Angeles, 90020



Sold and shipped by Alltech Devices, LLC | Pro Seller

★★★★☆ 103 seller reviews

View seller information



Free 30-day returns Details



Add to list



Add to registry

Continue your search on Walmart

bucket mouse trap

onebit rat bar poison

rinnetraps - flip n slide bucket lid mouse trap

mouse tramp

rat trap bucket

flip and slide mouse trap

mouse trap flip bucket top

bucket mouse trap 5 gallon

Similar items you might like

Based on what customers bought



Reduced price

12PCS



Sponsored

\$37.71

Oxgord Live Animal Trap Humane Catch & Release Cage Cat Rabbit Rodents 2-Door Foldable Heavy Duty Trapping Kit (Large)...

★★★★☆ 134

2-day shipping

+ Add



Flying insect light trap Free of chemical insecticides.

Sponsored ⓘ



Slide Bucket Lid Mouse Rat Trap



Where To Use This Trap?



How This Trap Works



Mice climb the provided ramp toward the bait located inside of the tunnel



Mice will inch out onto the counter weighted platform to eat the bait

NOTE: BUCKET NOT INCLUDED



The mouse's weight will trigger the platform to fall forward



The platform will then automatically reset for the next mouse



Estrela
Flip N Slide Bucket Lid Mouse Trap,Slide N Bucket Lid Mouse Rat Trap,Auto Reset Mouse Trap for Indoor and Outdoor (Yellow)

Free 30-day returns

\$9.99 Price when purchased online ⓘ

Add to cart

How do you want your item?

Shipping
Arrives Jun 7
\$7.00

Pickup
Not available

Delivery
Not available

Delivery to Los Angeles, 90020

Sold and shipped by Estrela
[View seller information](#)
Free 30-day returns [Details](#)

Add to list

Add to registry

Popular items in this category

Best selling items that customers love



Options



+ Add



Options



+ Add

Sponsored

\$21.99

2 Pack Mouse Catchers Bucket Lid with Upgraded Clear Box, 2 Entrances & Auto Reset, Reusable Humane Rat Catcher for...

2-day shipping

+ Add


STEM

Flying insect light trap


Free of chemical insecticides.


Sponsored ⓘ


2Pack




2Pack









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OFF!

Prevent bug bites

Protection for every day.

Sponsored



Wide Range of Use

VERY EFFICIENT & HUMANE

Efficient Humane Mouse Trap

Human, Pet & Eco Friendly

Your Kitchen Good Helper







HYEASTR
HYEASTR Mouse Trap Bucket Lid (2 Pack) - Humane Flip and Slide Bucket Lid Mouse/Mice/Rat Trap, Auto Reset, Multi Catch Mice Trap Compatible with 5 Gallon Bucket for Indoor/Outdoor/Chicken Coop
★☆☆☆☆ (1.0) [1 review](#)

 Free shipping  Free 30-day returns

\$16.79 Price when purchased online

[Add to cart](#)

How you'll get this item:



Shipping
Arrives May 30
Free



Pickup
Not available



Delivery
Not available

Los Angeles, 90020 [Change](#)

Arrives by **Thu, May 30** | [More options](#)

 Sold and shipped by **HYEASTR STORE**

★★★★☆ 3 seller reviews
[View seller information](#)

 Free 30-day returns [Details](#)

 [Add to list](#)  [Add to registry](#)

Similar items you might like

Based on what customers bought





[+ Add](#)





[+ Add](#)





[+ Add](#)





[Options](#)





Sponsored



\$37.71

Oxford Live Animal Trap Humane Catch & Release Cage Cat Rabbit Rodents 2-Door Foldable Heavy Duty Trapping Kit (Large)...

★★★★☆ 134

2-day shipping

[+ Add](#)



Shop Now

Mouse Trap-Flip N Slide Bucket Lid Mouse,Chipmunk Trap|No See Kill| Humane or Lethal| Door Style| Auto Reset| Multi Catch| in- Outdoor| 5 Gallon Bucket Compatible| Reusable| Treated As Humanely...

Brand: Dishe

3.7 8 ratings

\$48⁶⁹

FREE Returns

Brand

Dishe

Style

Modern

Number of Pieces

1

Is Electric

Yes


Target Species

Mouse, Rat, Chicken


Report an issue with this product or seller

Products related to this item


Sponsored




Multi-Catch Mouse Traps Outdoor - Humane or Lethal Squirrel Traps - 5 Gallon Bucket...
3.0 85
\$49⁹⁹
prime




Mouse Trap Bucket- 5 Gallon Bucket Lid Mouse Rat Trap 3 Pack - Automatic Reset Flip...
3.6 2,554
\$23⁸⁸ (\$7.96/Count)
prime



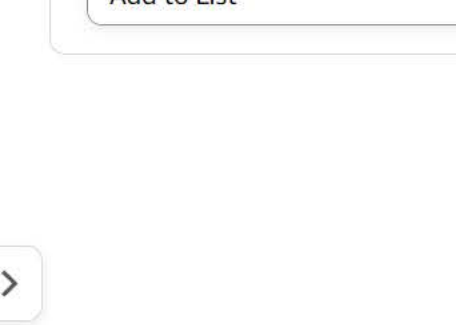
Mouse Trap Bucket- 5 Gallon Bucket Lid Mouse Rat Trap 4 Pack - Automatic Reset Flip...
3.8 709
\$28⁸⁸ (\$7.22/Count)
prime



Upgraded 5 Gallon Bucket Lid, Bucket Lid, Trapdoor Style, Indoor and Outdoor, Reusa...
3.2 417
\$12⁹⁸
prime



LockNLube Grease Gun Coupler locks onto Zerk fittings. Grease goes in, not on the m...
4.7 29,642
#1 Best Seller
\$32⁹⁹
prime



200PCS Barrel Snap Swivel Fishing Accessories, Premium Fishing Gear...
4.6 5,555
\$9⁹⁹
prime

prime

Enjoy fast, free delivery, exclusive deals, and award-winning movies & TV shows with Prime
Try Prime and start saving today with fast, free delivery

Delivery

Pickup

\$48⁶⁹

FREE Returns

FREE delivery Tuesday, May 28.
Order within 14 hrs 24 mins

Delivering to Los Angeles 90020 -
Update location

Only 1 left in stock - order soon.

Add to Cart

Buy Now

Ships from

Amazon

Sold by

lorado

Returns

Eligible for Return, Refund or Replacement within 30 days of receipt

Payment

Secure transaction

Add a gift receipt for easy returns

Add to List

Page 1 of 2



Raid Essentials Flying Insect Light Trap Starter Kit, 1 Plug-In Device + 1...
★★★★☆ 2,938

Save 5% more with Subscribe & Save

Shop now

Back to results



Roll over image to zoom in



VIDEO



Walk The Plank Bucket Mouse Trap | Flip and Slide | Water-Proof | Durable | Auto-Reset - Live or Kill

Brand: PLANKYPRO
3.9 ★★★★★ 775 ratings
50+ bought in past month

-10% \$17⁹⁹

List Price: \$19.99 ⓘ

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Get \$10 off instantly: Pay \$7.99 \$17.99 upon approval for the Amazon Store Card. No annual fee.

Item Package Quantity: 1

Color: Black

Brand	PLANKYPRO
Color	Black
Style	Plank
Material	Plastic
Number of Pieces	1
Is Electric	No
Target Species	Mouse, Rat

About this item

- AUTO RESET:** The trap resets automatically. You can catch multiple mice at once.
- WATERPROOF:** Unlike other traps in the market, our trap is made from durable waterproof plastic.
- POISON FREE:** Simply use peanut butter or any other bait that can be stuck to the trap. Keeps your pets safe and out of danger.
- LIVE OR KILL:** You have option of using the device as a live catch or to kill the mice. Use water in the bucket if you intend on not releasing the mice. Using fine sand or saw dust at the bottom prevents the mice from jumping out. Using taller bucket is help with the live catch.
- IMPORTANT (UNIVERSAL BODY) :** This plank included in this trap set is specifically calibrated for smaller mice. However a set including bigger plank is available for purchase. Additionally you can also just buy the bigger plank only if you already purchased the smaller trap set. The same UNIVERSAL BODY works with both plank.

Additional Details

Small Business



Enjoy fast, free delivery, exclusive deals, and award-winning movies & TV shows with Prime
Try Prime and start saving today with fast, free delivery

Delivery Pickup

One-time purchase: ☒
\$17⁹⁹

Get Fast, Free Shipping with Amazon Prime
FREE Returns

FREE delivery Tuesday, May 28 on orders shipped by Amazon over \$35

Or fastest delivery Tomorrow, May 23. Order within 7 hrs 6 mins

Delivering to Los Angeles 90020 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by Polyproducts44_USA
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Payment Secure transaction

☐ Add a gift receipt for easy returns

Subscribe & Save: ☐
\$17⁹⁹ (\$17.99 / Count)
FREE delivery Tuesday, May 28 on orders shipped by Amazon over \$35